

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Hearing Date and Time:

May 16, 2023 at 11:30 a.m.

NOTICE OF DEBTOR'S CROSS-MOTION FOR ENTRY OF PROTECTIVE ORDER

PLEASE TAKE NOTICE that, pursuant to the *Order Shortening Time Period for*

Notice, Setting Hearing and Limiting Notice [Dkt. 444] (the “OST”), on May 16, 2023 at 11:30 a.m., LTL Management LLC, the above-captioned debtor (the “Debtor”), by and through its proposed counsel, shall cross-move before the Honorable Michael B. Kaplan, United States

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

Bankruptcy Court, at the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, in response to the Official Committee of Talc Claimants' Motion for Entry of Protective Order [Dkt. 439], for the entry of a protective order (the "Cross-Motion").

PLEASE TAKE FURTHER NOTICE that, pursuant to D.N.J. LBR 9013-2, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon (a) the Debtor's undersigned counsel, (b) the proposed counsel to the Official Committee of Talc Claimants, (c) legal representative for future talc claimants and her proposed counsel, (d) the proposed counsel for the Ad Hoc Group of Supporting counsel, (e) the Office of the United States Trustee for the District of New Jersey and (f) any other party entitled to notice in accordance with the OST.

PLEASE TAKE FURTHER NOTICE that, unless an objection is timely filed and served, the Cross-Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing

Dated: May 11, 2023

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

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